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Silicon Test Systems Inc., and Silicon Test Solutions LLC

United States District Court  
Northern District of California, San Jose Division

VERIGY U.S. INC., a Delaware corporation

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual;  
WESLEY MAYDER, an individual;  
SILICON TEST SYSTEMS INC., a  
California corporation; SILICON TEST  
SOLUTIONS LLC, a California limited  
liability corporation,

Defendants.

Case No. 5:07-cv-04330 (RMW) (HRL)

**Declaration of Kevin M. Pasquinelli in Support  
of Defendant's Administrative Motion for Leave  
to File Exhibit C to the Letter Brief re: Motion  
to Compel Disk Drive Discovery Under Seal**

Judge: Hon. Howard R. Lloyd  
Ctrm: 2

Complaint filed: August 22, 2007  
Trial Date: None Set

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1 I, Kevin M. Pasquinelli, declare as follows:

2 1. I am an attorney licensed to practice law before the courts of the State of California. I am an  
3 associate with the law firm of Mount & Stoelker, P.C. I have personal knowledge of the fact set forth  
4 in this declaration, and if called to do so, I could and would competently testify thereto.  
5

6 2. I submit this declaration in support of Defendant's Administrative Motion for Leave to File  
7 Exhibit C to the Letter Brief re: Motion to Compel Disk Drive Discovery Under seal.

8 3. I have reviewed Exhibit C to the Letter Brief regarding the motion to compel discovery of  
9 Defendants disk drives.

10 4. I have determined that the Exhibit contains information previously designated as "Highly  
11 Confidential – Attorney Eyes Only" by Plaintiffs under the stipulated protective order. (Defendants  
12 reserve the right to challenge such designations pursuant to the Stipulated Protective Order).  
13

14 5. I am informed and believe that Verigy (Plaintiff) contends that its confidentiality interest of  
15 overcomes the right of public access to the record, and that a substantial probability exists that the  
16 parties' overriding confidentiality interest will be prejudiced if the record is not sealed. Further,  
17 Verigy contends that the proposed sealing is narrowly tailored and no less restrictive means exist to  
18 achieve this overriding interest.

19 I declare under penalty of perjury under the laws of the United States of America that the  
20 foregoing is true and correct and that this declaration was executed this 22<sup>nd</sup> day of October, 2007 in  
21 San Jose, California.  
22

23 \_\_\_\_\_  
/s/

24 Kevin M. Pasquinelli  
25  
26  
27  
28